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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JOSEPH H.
MARGOLIES IN SUPPORT OF THE
JOINT SUBMISSION RE: SEALING
PORTIONS OF THE COURT'S MARCH
20, 2023 ORDER REGARDING
SANCTIONS AND PRESERVATION**

Judge: Hon. Susan van Keulen, USMJ

I, Joseph H. Margolies, declare as follows:

1. I am a member of the bar of the State of New York and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I have been admitted *pro hac vice* in the United States District Court for the Northern District of California in connection with this action. Dkt. 681. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. On March 20, 2023, the Court issued a Redaction Order (Dkt. 903), requiring the parties to jointly submit proposed redactions to its March 20, 2023 Sealed Orders on (1) Plaintiffs’ Motion for Additional Discovery Sanctions and Google’s Administrative Motion for Leave to Deprecate, and (2) Preservation of Certain Mapping and Linking Tables (Dkts. 898, 899, together, the “Orders”), by March 30, 2023.

3. On March 28, 2023, I sent Plaintiffs’ counsel proposed redactions via email in the form of a proposed joint submission. On March 29, 2023, Plaintiffs’ counsel responded and authorized Google to file the joint submission filed herewith.

4. Google proposes to seal only the portions of the Orders listed in the table below, for the reasons set forth in the table entries labeled “Basis for Sealing.”

Document(s) to be Sealed	Basis for Sealing
March 20, 2023 Order on: (1) Plaintiffs’ Motion for Additional Discovery Sanctions, and (2) Google’s Administrative Motion for Leave to Deprecate (Dkt. 898)	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including various types of Google’s internal projects and project code names, data sources, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the

Document(s) to be Sealed	Basis for Sealing
	information to compromise Google's internal practices relating to competing products.
<p>March 20, 2023 Order on: Preservation of Certain Mapping and Linking Tables (Dkt. 899)</p> <p>Pages 1:6, 2:1–4, 2:6, 3:8, 3:10, 3:16, 3:18, 3:20–21, 3:25, 4:3, 4:8, 4:12, 4:17, 4:19–20, 4:24–25, 5:1, 5:3, 5:14–16, 5:19, 5:21, 5:28, 6:3–6, 6:11–13, 6:15–16, 6:18–19, 6:21, 6:23–25, 6:27, 7:2, 7:4, 7:16, 7:19, 7:21, 7:24–25, 7:27–28, 8:1, 8:4–5, 8:8, 8:11–12, 8:14–16, 8:18, 8:23, 8:26, 9:1, 9:6, 9:25, 10:5–7, 10:17–19, 10:23–24, 13: 11, 13:13, 14:8, 14:11, 14:15</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and project code names, data sources, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>

5. Google does not seek to redact or file under seal any of the remaining portions of documents not indicated in the table above.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in Bayside, Wisconsin on March 29, 2023.

By /s/ Joseph H. Margolies

Joseph H. Margolies
Attorney for Defendant